

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

AMAZON.COM, INC. and AMAZON
DATA SERVICES, INC.,

Plaintiffs,

v.

CASE NO. 1:20-CV-484

WDC HOLDINGS LLC dba NORTHSTAR
COMMERCIAL PARTNERS; BRIAN
WATSON; STERLING NCP FF, LLC;
MANASSAS NCP FF, LLC; NSIPI
ADMINISTRATIVE MANAGER; NOVA
WPC LLC; WHITE PEAKS CAPITAL LLC;
VILLANOVA TRUST; JOHN DOES 1-20,

Defendants.

**DECLARATION OF TRAVIS S. ANDREWS IN SUPPORT OF
PLAINTIFFS' MOTION FOR AN ORDER TO SHOW CAUSE WHY
DEFENDANTS BRIAN WATSON AND WDC HOLDINGS LLC SHOULD NOT
BE HELD IN CONTEMPT OF THE JUNE 5, 2020 PRELIMINARY INJUNCTION**

I, Travis S. Andrews, hereby declare, under penalty of perjury, as follows:

1. I am over the age of 18 years. I have personal knowledge of the facts set forth below, and if called upon to do so, I could and would competently testify thereto.

2. I am an attorney licensed to practice law in the Commonwealth of Virginia and in the District of Columbia. I am an attorney at the law firm of Gibson, Dunn & Crutcher LLP, and counsel of record for Amazon.com, Inc. and Amazon Data Services, Inc. I make this declaration in support of Plaintiffs' Motion for an Order to Show Cause Why Defendants Watson and WDC Holdings LLC Should Not Be Held in Contempt of the June 5, 2020 Preliminary Injunction. If called as a witness, I could and would testify to the same as stated herein.

3. After the May 21, 2020 hearing in this case—during which the Court granted Plaintiffs’ request for a preliminary injunction (“PI”)—Plaintiffs emailed Defendants Watson and WDC Holdings (collectively, “Defendants”) on May 22, 2020 to confer on the open provisions in the order. Defendants proposed a teleconference, and Plaintiffs circulated a draft protective order. The parties spoke by teleconference on May 27, 2020 and May 28, 2020 about the protective order and the bond that Defendants had mentioned during the May 21, 2020 hearing before this Court.

4. Attached hereto as **Exhibit A** is a true and correct copy of an email chain between Elizabeth Papez, Stanley Garnett, Greg Brower, James Trusty, George Calhoun, Jeff Hamlin, and Patrick Stokes, starting on Friday, May 29, 2020, and ending on Wednesday, June 3, 2020, with the subject line “RE: EDVA No. 1:20-cv-484,” discussing Defendants’ purported efforts to obtain a bond.

5. Attached hereto as **Exhibit B** is a true and correct copy of an email from Stanley Garnett to Andrew Travis, Greg Brower, James Trusty, and George Calhoun, and copying Elizabeth Papez, Patrick Stokes and Claudia Barrett, starting on Friday June 12, 2020 and ending on Monday, June 15, 2020, with the subject line “Bond update,” discussing Defendants’ purported efforts to obtain a bond.

6. Attached hereto as **Exhibit C** is a true and correct copy of an email chain between Elizabeth Papez, Stanley Garnett, Travis Andrews, Greg Brower, James Trusty, George Calhoun, Patrick Stokes, Claudia Barrett, and Lora MacDonald, starting on Friday, June 5, 2020 and ending on Wednesday, June 10, 2020, with the subject line “RE: Sealed Preliminary Injunction 1:20cv484,” relating to the unsealing notice, redactions to various exhibits, and the status of Defendants’ bond.

7. Attached hereto as **Exhibit D** is a true and correct copy of excerpts of a TLO Business Report, compiled on February 24, 2020, detailing, as relevant here, WDC Holdings' property deeds and assessments.

8. Attached hereto as **Exhibit E** is a true and correct copy of the transcript to the May 21, 2020 hearing before this Court on Amazon's motion for a preliminary injunction.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 2, 2020.

A handwritten signature in black ink, appearing to read "T Andrews", is written over a horizontal line.

Travis S. Andrews